

FILE COPY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

THE NORTH FACE APPAREL CORP., a
Delaware Corporation; and PRL USA
HOLDINGS, INC., a Delaware Corporation,
Plaintiffs

v.

FUJIAN SHARING IMPORT & EXPORT
LTD. CO. d/b/a B2BSHARING.COM;
DONGPING LIU a/k/a DONG PING LIU;
YUAN CHEN; ANDY HUANG; MIN CHEN;
CAI XIAN SHENG; MICHAEL LIN; LIMING
WANG a/k/a JUNZHENG JIA; FANG
CHENG; WEIXIAN LIN; ZHOU CHANG; PP
JINBO; JERRY URBEN; HUNAG YANXIA;
WANG ZHAO HUI; CHENGYUAN ZHAO;
ZHAO HUI; ZHANG XUE PING;
QINGXIONG SU; CAI XIANGJIAO;
ZHUANG TING TING; XU DAN; INFEI YE;
ZOU JIA QI; LIU ZHAO DI; CHENG XIAO
RONG; XIE ZHAO XI; HUANG DENIG
QIANG; JIE ZHAO; LIN XIA MEI; WENG
FENG ZHU; JIA DE BAO; QIAO YAN PING;
XI QIANG; TAO ZHU; LIN JIAN PING; CAI
ZHONG YING a/k/a NANCY LIN; WANG
XUEMIN; JUNMIN JIA; LIU SU JUN;
FANMING WU; HUANG ZHI BING;
CONGLONG LIN; LIU LIN FIANG; GUO
XUE LIANG; MING FENQ GU; ZHENG YU
TANG; CHEN WEIGUI; YU JIA LONG; LU
XIAO YANG; LIU QIAO LING; CHEN JIAN
SHENG; CAO CHUN LIN; CHEN JIAN;
JIANG LONG SHENG; MA SHI LEI; JUNJIE
JIA; HUANG JIAN XIONG; CHENG XIAN
WEI; WANG ZHEN YONG; JIAN CHEN LIN;
QIU LI SHAN; XIAN TING; WANSHAN LIN;
CHEN QING CHONG; HUANG JIAN RUI;
ZHIYAN LI; RUI YANG; YOU ZONG
YANG; MI GUI YING; LU XIN LUAN;
CHEN JIANFANG; RUI ZHANG IXIE;
ZHIANG SHU; LIN YI CHUN; LI ZHAN; LU
MINGZHI; WU ZHIYONG; WANG YUN
MINGZHI; TIAN ZHENHUA; GUO ZHI BIN;

CIVIL ACTION NO. 10-CIV-1630
(AKH)

FIRST AMENDED COMPLAINT



MIAO CHUN LAN; WENG YI XIN; LIANG XIAOYANG; YIN LI YING; FAN QIANG; LI XUE FENG; GUAN WEI JIAN; SUN CUI RONG; XIU MING ZHI; CAI YUN JING; YE XIN ZHUO; CHEN SHUANG YING; CHEN YA BO; SU YUAN LIAN; GUO SUQING; LIN JUN QIN; WANG ZHI XIANG; XIE CHAO; FAN KEYANG; CAI YA QUAN; WENG YUAN DONG; CHEN SHUN JIN; XU WEIQUN; ZHU TING MING; JOHN AND JANE DOES; AND XYZ COMPANIES

Defendants.

Plaintiffs THE NORTH FACE APPAREL CORP. and PRL USA HOLDINGS, INC. hereby file this Complaint for *inter alia* trademark counterfeiting, cybersquatting and related claims against Defendants FUJIAN SHARING IMPORT & EXPORT LTD. CO. d/b/a B2BSHARING.COM; DONGPING LIU a/k/a DONG PING LIU; YUAN CHEN; ANDY HUANG; MIN CHEN; CAI XIAN SHENG; MICHAEL LIN; LIMING WANG a/k/a JUNZHENG JIA; FANG CHENG; WEIXIAN LIN; ZHOU CHANG; PP JINBO; JERRY URBEN; HUNAG YANXIA; WANG ZHAO HUI; CHENGYUAN ZHAO; ZHAO HUI; ZHANG XUE PING; QINGXIONG SU; CAI XIANGJIAO; ZHUANG TING TING; XU DAN; INFEI YE; ZOU JIA QI; LIU ZHAO DI; CHENG XIAO RONG; XIE ZHAO XI; HUANG DENIG QIANG; JIE ZHAO; LIN XIA MEI; WENG FENG ZHU; JIA DE BAO; QIAO YAN PING; XI QIANG; TAO ZHU; LIN JIAN PING; CAI ZHONG YING a/k/a NANCY LIN; WANG XUEMIN; JUNMIN JIA; LIU SU JUN; FANMING WU; HUANG ZHI BING; CONGLONG LIN; LIU LIN FIANG; GUO XUE LIANG; MING FENQ GU; ZHENG YU TANG; CHEN WEIGUI; YU JIA LONG; LU XIAO YANG; LIU QIAO LING; CHEN JIAN SHENG; CAO CHUN LIN; CHEN JIAN; JIANG LONG SHENG; MA SHI LEI; JUNJIE JIA; HUANG JIAN XIONG; CHENG XIAN WEI; WANG ZHEN YONG; JIAN CHEN LIN; QIU LI SHAN; XIAN TING; WANSHAN LIN;

CHEN QING CHONG; HUANG JIAN RUI; ZHIYAN LI; RUI YANG; YOU ZONG YANG;
MI GUI YING; LU XIN LUAN; CHEN JIANFANG; RUI ZHANG IXIE; ZHIANG SHU; LIN
YI CHUN; LI ZHAN; LU MINGZHI; WU ZHIYONG; WANG YUN MINGZHI; TIAN
ZHENHUA; GUO ZHI BIN; MIAO CHUN LAN; WENG YI XIN; LIANG XIAOYANG; YIN
LI YING; FAN QIANG; LI XUE FENG; GUAN WEI JIAN; SUN CUI RONG; XIU
MINGZHI; CAI YUN JING; YE XIN ZHUO; CHEN SHUANG YING; CHEN YA BO; SU
YUAN LIAN; GUO SUQING; LIN JUN QIN; WANG ZHI XIANG; XIE CHAO; FAN
KEYANG; CAI YA QUAN; WENG YUAN DONG; CHEN SHUN JIN; XU WEIQUN; ZHU
TING MING; JOHN and JANE DOES; and XYZ COMPANIES, on personal knowledge as to
Plaintiffs' own activities and on information and belief as to the activities of others:

THE PARTIES

1. Plaintiff THE NORTH FACE APPAREL CORP. ("The North Face") is a corporation, organized and existing under the laws of Delaware, having a principal place of business at 3411 Silverside Road, Wilmington, Delaware 19810.
2. Plaintiff PRL USA HOLDINGS, INC. ("Polo Ralph Lauren") is a corporation, organized and existing under the laws of the State of Delaware, having its principal place of business at 103 Foulk Road, Wilmington, Delaware 19803. (The North Face and Polo Ralph Lauren are collectively referred to as "Plaintiffs" and each, individually, as a "Plaintiff.")
3. Defendant FUJIAN SHARING IMPORT & EXPORT LTD. CO., d/b/a B2BSHARING.COM is a business whose actual name is currently unconfirmed and true address is currently unknown.
4. Defendant DONGPING LIU a/k/a DONG PING LIU is an individual whose actual name is unconfirmed and true address currently unknown.

5. Defendant YUAN CHEN is an individual whose actual name is unconfirmed and true address currently unknown.

6. Defendant ANDY HUANG is an individual whose actual name is unconfirmed and true address currently unknown.

7. Defendant MIN CHEN is an individual whose actual name is unconfirmed and true address currently unknown.

8. Defendant CAI XIAN SHENG is an individual whose actual name is unconfirmed and true address currently unknown.

9. Defendant MICHAEL LIN is an individual whose actual name is unconfirmed and true address currently unknown.

10. Defendant LIMING WANG a/k/a JUNZHENG JIA is an individual whose actual name is unconfirmed and true address currently unknown.

11. Defendant FANG CHENG is an individual whose actual name is unconfirmed, who may be residing or doing business at No. 19, Shijing, Shijing Village, Pinghai Town, Xiuyu District, Putian, Fujian, 351100, China.

12. Defendant ZHOU CHANG is an individual whose actual name is unconfirmed and true address currently unknown.

13. Defendant PP JINBO is an individual whose actual name is unconfirmed and true address currently unknown.

14. Defendant JERRY URBEN is an individual whose actual name is unconfirmed and true address currently unknown.

15. Defendant HUNAG YANXIA is an individual whose actual name is unconfirmed and true address currently unknown.

16. Defendant WANG ZHAO HUI is an individual whose actual name is unconfirmed and true address currently unknown.

17. Defendant CHENGYUAN ZHAO is an individual whose actual name is unconfirmed and true address currently unknown.

18. Defendant ZHAO HUI is an individual whose actual name is unconfirmed, who may be residing or doing business at Room 2101, No 1 Building, 1st Zone, Jingtie Homeland, West. 4th Ring Road Middle Rd, Fengtai District, Beijing, 100039, China.

19. Defendant ZHANG XUE PING is an individual whose actual name is unconfirmed, who may be residing or doing business at 66-3-602 Jiazhoushuijun, Changyangzhen Fangshan District, Beijing, 102445, China.

20. Defendant QINGXIONG SU is an individual whose actual name is unconfirmed, who may be residing or doing business at No. 4 Building, C Zone, Liyuan Community, Putian, Fujian, 351100, China.

21. Defendant WEIXIAN LIN is an individual whose actual name is unconfirmed, who may be residing or doing business at Room 804, Xinyuan Plaza, No.35, Guanghua Road, Chengxiang District, Putian, Fujian, 351100, China.

22. Defendant CAI XIANGJIAO is an individual whose actual name is unconfirmed, who may be residing or doing business at No. 7, Nanyuan Road, Putian, Fujian, 351100, China.

23. Defendant ZHUANG TING TING is an individual whose actual name is unconfirmed, who may be residing or doing business at No. 163, North Shengli Road, Xiangcheng District, Zhangzhou, Fujian, 363000, China.

24. Defendant XU DAN is an individual whose actual name is unconfirmed, who may be residing or doing business at Shanghai Qixin Road 2288-58-201, Shanghai, 201101, China.

25. Defendant INFEI YE is an individual whose actual name is unconfirmed and true address currently unknown.

26. Defendant ZOU JIA QI is an individual whose actual name is unconfirmed, who may be residing or doing business at 20th Floor, Baifu International Plaza, North of Dongdaqiao Lukou, Chaoyang District, Beijing, 100020, China.

27. Defendant LIU ZHAO DI is an individual whose actual name is unconfirmed, who may be residing or doing business at No. 60, Haida Road, Fuding, Fujian, 355200, China.

28. Defendant CHENG XIAO RONG is an individual whose actual name is unconfirmed, who may be residing or doing business at Room 507, No.3 Building, 4st Area, Buxin Garden, Buxin Road, Luohu District, Shenzhen, Guangdong, 518000, China.

29. Defendant XIE ZHAO XI is an individual whose actual name is unconfirmed, who may be residing or doing business at Block 136, Jiefang Road, Chengguan Zhen, Youxi Xian, Sanming, Fujian, 365100, China.

30. Defendant HUANG DENIG QIANG is an individual whose actual name is unconfirmed, who may be residing or doing business at No. 21, Xingguang Road, Dongfang Xia Wan Na, Conghua, Guangdong, 510990, China.

31. Defendant JIE ZHAO is an individual whose actual name is unconfirmed, who may be residing or doing business at Room 6, 1st Floor of 6th Building, No. 17, Jianqiao Road, Jining City, Wulanchabu, Inner Mongolia, 012457, China.

32. Defendant LIN XIA MEI is an individual whose actual name is unconfirmed, who may be residing or doing business at Room 116, Xincuo, Xiadong Village, Dongqiao Town, Xiuyu District, Putian, Fujian, 351164, China.

33. Defendant WENG FENG ZHU is an individual whose actual name is unconfirmed, who may be residing or doing business at Xialin Development Zone, Chengxiang District, Putian, Putian City Fengteng Industry Co., Ltd, Putian, Fujian, 351100, China.

34. Defendant JIA DE BAO is an individual whose actual name is unconfirmed, who may be residing or doing business at 62-1-701 Jiazhoushuijun Community, Fangshan District, Beijing, 102445, China.

35. Defendant QIAO YAN PING is an individual whose actual name is unconfirmed, who may be residing or doing business at Room 131, 10th Building, Dulan Community, Qingshan District, Baotou, Inner Mongolia, 014030, China.

36. Defendant XI QIANG is an individual whose actual name is unconfirmed, who may be residing or doing business at Room 6, 5th Row, No.1, Xingfu Lane, Jining District, Wulanchabu City, Inner Mongolia, 012000, China.

37. Defendant TAO ZHU is an individual whose actual name is unconfirmed, who may be residing or doing business at 106 Xiwang Road, Guangzhou, Gunagdong, 510160, China.

38. Defendant LIN JIAN PING is an individual whose actual name is unconfirmed, who may be residing or doing business at Xiadian, Gaolin Village, Daitou Town, Xiuyu District, Putian, Fujian, 351166 China.

39. Defendant CAI ZHONG YING a/k/a NANCY LIN is an individual whose actual name is unconfirmed and resides at No. 3 Guishan Village, Lingchuan Town, Chengxiang District, Putian, Fujian 351100, China.

40. Defendant WANG XUEMIN is an individual whose actual name is unconfirmed, who may be residing or doing business at 602 Shi 13 Hao Lou Xingan Load, Putian, Fujian 351100, China.

41. Defendant JUNMIN JIA is an individual whose actual name is unconfirmed and true address currently unknown.

42. Defendant LIU SU JUN is an individual whose actual name is unconfirmed and true address currently unknown.

43. Defendant FANMING WU is an individual whose actual name is unconfirmed and true address currently unknown.

44. Defendant HUANG ZHI BING is an individual whose actual name is unconfirmed and true address currently unknown.

45. Defendant CONGLONG LIN is an individual whose actual name is unconfirmed and true address currently unknown.

46. Defendant LIU LIN FIANG is an individual whose actual name is unconfirmed and true address currently unknown.

47. Defendant GUO XUE LIANG is an individual whose actual name is unconfirmed and true address currently unknown.

48. Defendant MING FENQ GU is an individual whose actual name is unconfirmed and true address currently unknown.

49. Defendant ZHENG YU TANG is an individual whose actual name is unconfirmed and true address currently unknown.

50. Defendant CHEN WEIGUI is an individual whose actual name is unconfirmed and true address currently unknown.

51. Defendant YU JIA LONG is an individual whose actual name is unconfirmed and true address currently unknown.

52. Defendant LU XIAO YANG is an individual whose actual name is unconfirmed and true address currently unknown.

53. Defendant LIU QIAO LING is an individual whose actual name is unconfirmed and true address currently unknown.

54. Defendant CHEN JIAN SHENG is an individual whose actual name is unconfirmed and true address currently unknown.

55. Defendant CAO CHUN LIN is an individual whose actual name is unconfirmed and true address currently unknown.

56. Defendant CHEN JIAN is an individual whose actual name is unconfirmed and true address currently unknown.

57. Defendant JIANG LONG SHENG is an individual whose actual name is unconfirmed and true address currently unknown.

58. Defendant MA SHI LEI is an individual whose actual name is unconfirmed and true address currently unknown.

59. Defendant JUNJIE JIA is an individual whose actual name is unconfirmed and true address currently unknown.

60. Defendant HUANG JIAN XIONG is an individual whose actual name is unconfirmed and true address currently unknown.

61. Defendant CHENG XIAN WEI is an individual whose actual name is unconfirmed and true address currently unknown.

62. Defendant WANG ZHEN YONG is an individual whose actual name is unconfirmed and true address currently unknown.

63. Defendant JIAN CHEN LIN is an individual whose actual name is unconfirmed and true address currently unknown.

64. Defendant QIU LI SHAN is an individual whose actual name is unconfirmed and true address currently unknown.

65. Defendant XIAN TING is an individual whose actual name is unconfirmed and true address currently unknown.

66. Defendant WANSHAN LIN is an individual whose actual name is unconfirmed and true address currently unknown.

67. Defendant CHEN QING CHONG is an individual whose actual name is unconfirmed and true address currently unknown.

68. Defendant HUANG JIAN RUI is an individual whose actual name is unconfirmed and true address currently unknown.

69. Defendant ZHIYAN LI is an individual whose actual name is unconfirmed and true address currently unknown.

70. Defendant RUI YANG is an individual whose actual name is unconfirmed and true address currently unknown.

71. Defendant YOU ZONG YANG is an individual whose actual name is unconfirmed and true address currently unknown.
72. Defendant MI GUI YING is an individual whose actual name is unconfirmed and true address currently unknown.
73. Defendant LU XIN LUAN is an individual whose actual name is unconfirmed and true address currently unknown.
74. Defendant CHEN JIANFANG is an individual whose actual name is unconfirmed and true address currently unknown.
75. Defendant RUI ZHANG IXIE is an individual whose actual name is unconfirmed and true address currently unknown.
76. Defendant ZHIANG SHU is an individual whose actual name is unconfirmed and true address currently unknown.
77. Defendant LIN YI CHUN is an individual whose actual name is unconfirmed and true address currently unknown.
78. Defendant LI ZHAN is an individual whose actual name is unconfirmed and true address currently unknown.
79. Defendant LU MINGZHI is an individual whose actual name is unconfirmed and true address currently unknown.
80. Defendant WU ZHIYONG is an individual whose actual name is unconfirmed and true address currently unknown.
81. Defendant WENG YI XIN is an individual whose actual name is unconfirmed and true address currently unknown.

82. Defendant LIANG XIAOYANG is an individual whose actual name is unconfirmed and true address currently unknown.

83. Defendant YIN LI YING is an individual whose actual name is unconfirmed and true address currently unknown.

84. Defendant FAN QIANG is an individual whose actual name is unconfirmed and true address currently unknown.

85. Defendant LI XUE FENG is an individual whose actual name is unconfirmed and true address currently unknown.

86. Defendant GUAN WEI JIAN is an individual whose actual name is unconfirmed and true address currently unknown.

87. Defendant SUN CUI RONG is an individual whose actual name is unconfirmed and true address currently unknown.

88. Defendant XIU MINGZHI is an individual whose actual name is unconfirmed and true address currently unknown.

89. Defendant CAI YUN JING is an individual whose actual name is unconfirmed and true address currently unknown.

90. Defendant YE XIN ZHUO is an individual whose actual name is unconfirmed and true address currently unknown.

91. Defendant CHEN SHUANG YING is an individual whose actual name is unconfirmed and true address currently unknown.

92. Defendant CHEN YA BO is an individual whose actual name is unconfirmed and true address currently unknown.

93. Defendant SU YUAN LIAN is an individual whose actual name is unconfirmed and true address currently unknown.

94. Defendant GUO SUQING is an individual whose actual name is unconfirmed and true address currently unknown.

95. Defendant LIN JUN QIN is an individual whose actual name is unconfirmed and true address currently unknown.

96. Defendant WANG ZHI XIANG is an individual whose actual name is unconfirmed and true address currently unknown.

97. Defendant XIE CHAO is an individual whose actual name is unconfirmed and true address currently unknown.

98. Defendant FAN KEYANG is an individual whose actual name is unconfirmed and true address currently unknown.

99. Defendant CAI YA QUAN is an individual whose actual name is unconfirmed and true address currently unknown.

100. Defendant WENG YUAN DONG is an individual whose actual name is unconfirmed and true address currently unknown.

101. Defendant CHEN SHUN JIN is an individual whose actual name is unconfirmed and true address currently unknown.

102. Defendant XU WEIQUN is an individual whose actual name is unconfirmed and true address currently unknown.

103. Defendant ZHU TING MING is an individual whose actual name is unconfirmed and true address currently unknown.

104. The preceding named Defendants are acting in conjunction with various Defendant John and Jane Does and XYZ Companies whose identities are not presently known (collectively, "Defendants"). If Defendants' identities become known, the Complaint herein will be amended to include such names of these individuals and corporations.

105. Defendants are doing business in New York and this District and are subject to the jurisdiction of this Court.

JURISDICTION AND VENUE

106. This is an action for trademark counterfeiting and trademark infringement, cybersquatting and unfair competition and false designation of origin arising under the Trademark Act of 1946, 15 U.S.C. §§ 1051, *et seq.*, as amended by the Trademark Counterfeiting Act of 1984, Public Law 98-473 (October 12, 1984), the Anti-Counterfeiting Consumer Protection Act of 1996, Pub. L. 104-153 (July 2, 1996), and the Prioritizing Resources and Organization for Intellectual Property Act of 2007, H.R. 4279 (October 13, 2008) (the "Lanham Act"), and for unlawful and deceptive acts and practices under the laws of the State of New York.

107. This Court has original jurisdiction over this action pursuant to 28 U.S.C. §§ 1331, 1332 and 1338(a) and (b); and 15 U.S.C. §§ 1116 and 1121. This Court has jurisdiction, pursuant to the principles of supplemental jurisdiction and 28 U.S.C. § 1337, over Plaintiffs' claims for unlawful and deceptive acts and practices under the laws of the State of New York.

108. This Court has personal jurisdiction over Defendants in that they transact business in the State of New York and this District.

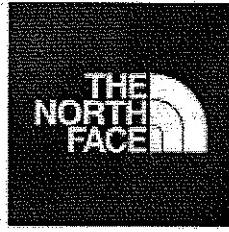
109. Venue is proper in this District pursuant to 28 U.S.C. §§ 1331 and 1400(a) in that the Defendants are entities or individuals subject to personal jurisdiction in this District.

BACKGROUND FACTS

The North Face's Trademarks and Business

110. The North Face is the owner of the entire right, title and interest in and to, *inter alia*, the following federally-registered trademarks and service marks:

Registration Number	Trademark	Goods and Services
983,624	THE NORTH FACE	Backpacks, sleeping bags, tents, snowshoes, skis and camping clothing, namely rainwear, parkas, vests, trousers, shoes, gloves and headgear.
1,030,071		Backpacks, sleeping bags, tents, snowshoes, skis and camping clothing, namely rainwear, parkas, vests, trousers, shoes, gloves and headgear.
1,102,407		Retail store, mail order, and distributorship services in the field of camping and outdoor gear, books, food, hardware and sports equipment.

Registration Number	Trademark	Goods and Services
2,097,715		Backpacks, sleeping bags, tents, snowshoes, skis and clothing, namely, parkas, vests, jackets, anoraks, pants, ski bibs, gloves, mittens, underwear, hats, headbands, caps, ski suits, gaiters, shorts, shirts and belts.
2,300,758		Shoes.
2,897,197	NEVER STOP EXPLORING	Backpacks, luggage, duffel bags, waist packs, sleeping bags, tents, clothing, namely, t-shirts, tops, shorts, sweatshirt, sweaters, pants, jackets, vests, anoraks, ski suits, ski jackets, ski vests, rain jackets, and rain pants, footwear and headwear.
3,294,604	THE NORTH FACE	Retail store, mail order, and distributorship services in the field of camping and outdoor gear, books, food, hardware and sports equipment.
3,294,605		Retail store, mail order, and distributorship services in the field of camping and outdoor gear, books, food, hardware and sports equipment.
3,538,773		Bags, umbrellas, sleeping bags, tents, tent accessories, clothing, retail services.
3,630,564	NEVER STOP EXPLORING	Retail store and on-line retail store services in the field of apparel, camping and outdoor gear, and outdoor sporting goods equipment.

111. All of the registrations listed above are valid, subsisting, unrevoked and uncancelled. Additionally, many of the registrations are also uncontestable. The North Face also owns common law rights in these and other marks for use in connection with apparel and retail store services, including on-line retail store services. The North Face's registered and common law trademarks are collectively referred to as the "THE NORTH FACE Marks."

112. The North Face, its predecessors in interest, associated companies and authorized licensees have sold high quality technical and casual outdoor apparel and equipment and other products ("The North Face Products") for more than 40 years using the THE NORTH FACE Marks. Among the most well-known and popular of the North Face Products are the iconic "Denali" and "Nuptse" style jackets.

113. The THE NORTH FACE Marks have been widely promoted, both in the United States and throughout the world and are among the world's most famous and widely-recognized trademarks. Consumers, potential consumers and other members of the public and outdoor products industry not only associate The North Face Products with exceptional materials, style and workmanship, but also recognize that The North Face Products sold in the U.S. originate exclusively with The North Face.

114. The North Face maintains quality control standards for all The North Face Products. Genuine The North Face Products are distributed through a worldwide network of authorized licensees, distributors, and retailers, including The North Face retail stores and The North Face's Internet web store located at www.thenorthface.com.

115. The THE NORTH FACE Marks are featured prominently in the advertising and promotion of The North Face Products. In 2009 alone, The North Face spent over \$15 million in advertising and promoting The North Face Products, which prominently bear the THE NORTH

FACE Marks. The THE NORTH FACE Marks are highly visible and distinctive worldwide symbols of excellence in quality and uniquely associated with The North Face.

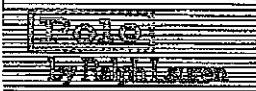
116. As a result, THE NORTH FACE Products bearing the THE NORTH FACE Marks generated over \$600 million dollars in sales in 2009 alone.

Polo Ralph Lauren's Trademarks and Business

117. Polo Ralph Lauren is the owner of the entire right, title and interest in and to, *inter alia*, the following federally-registered trademarks and service marks:

Registration Number	Trademark	Goods and Services
1,624,989	RALPH LAUREN	Clothing - namely, suits, slacks, trousers, shorts, wind resistant jackets, jackets, blazers, dress shirts, knit shirts, sweatshirts, sweaters, hats, belts, socks, blouses, skirts, coats and dresses.
984,005	Ralph Lauren	Suits, overcoats, sweaters, ties, shirts and pants.
3,521,190	RALPH LAUREN	On-line retail store services featuring men's, women's and children's clothing, footwear, headgear, eyewear, handbags, backpacks, travel bags, wallets, athletic bags, jewelry, watches, sporting goods and accessories, fragrance, body lotions, home furnishing in the nature of bedsheets, duvet covers, comforters, blankets, pillows, towels, table cloths, dinnerware, picture frames.
2,077,090	RALPH LAUREN	Providing information in the field of fashion, lifestyle and other topics of general interest by means of a global computer network

1,962,237	RALPH LAUREN	Mail order services featuring men's, womens' or children's wearing apparel, fashion accessories, home furnishings products and personal care products.
3,733,341	POLO RALPH LAUREN	Sweaters, shirts, sweatshirts, pants, shorts, jackets, coats, vests, hats, scarves, gloves, belts, ties, underwear, socks, shoes, sneakers, boots. sleepwear, robes, men's suits.
3,306,101	POLO RALPH LAUREN	Clothing, namely, knit shirts, polo shirts, sweaters, shirts, t-shirts, hats, swimwear, pants, jackets, belts, ties, footwear, socks; outerwear, namely, coats, sport coats, raincoats.
1,363,459	POLO	Clothing-Namely, Suits, Slacks, Trousers, Shorts, Wind Resistant Jackets, Jackets, Blazers, Dress Shirts, Sweatshirts, Sweaters, Hats, Belts, Socks, Blouses, Skirts, Coats, and Dresses.
2,083,276	POLO	Providing information in the field of fashion, fragrance, lifestyle and other topics of general interest by means of a global computer network.
3,199,839		Wearing apparel, namely, jackets, sweatshirts, sweat pants, hats, scarves, jerseys, jeans, turtlenecks and bikinis.
2,085,471		Providing information in the field of fashion, fragrance, lifestyle and other topics of general interest by means of a global computer network.

990,395	POLO BY RALPH LAUREN	Retail clothing store services.
2,643,114	LAUREN	Retail clothing store services.
2,312,818	RL	Wearing apparel, namely, jeans, jackets, woven shirts, T-shirts, knit shirts, sweatshirts, [overalls,] pants, sweaters, shorts, vests, [ties,] bathing suits, scarves, hosiery, [bodysuits,] belts, blouses, skirts, dresses, coats, hats and shoes.
978,166		Men's suits, slacks, ties, sweaters, shoes, shirts, hats, belts, socks; and ladies' blouses, skirts, suits and dresses.
1,508,314		Men's suits, slacks, ties, sweaters, jackets, coats, shoes, shirts, hats.
1,622,635		Men's, women's and children's clothing, namely pants, scarves, shirts, blouses, jackets, sweaters, skirts, shoes, sleepwear and socks.

118. All of the registrations set forth above are valid, subsisting, unrevoked and uncancelled. Additionally, many of these registrations are incontestable. Polo Ralph Lauren also owns common law rights in the above and other marks for use in connection with apparel, related accessories and retail stores, including on-line retail stores. Polo Ralph Lauren's registered and common law trademarks are collectively referred to as the "POLO RALPH LAUREN Marks."

119. Polo Ralph Lauren has, itself and through licensees, sold high-quality apparel, handbags, accessories, and other products (collectively, the "Polo Ralph Lauren Products") using the POLO RALPH LAUREN Marks for more than 40 years.

120. Polo Ralph Lauren was founded in 1967 by the now iconic designer, Ralph Lauren, and has since become a leader in the design, marketing, and distribution of premium lifestyle products in apparel, home, accessories and fragrances.

121. The continuous and broad use of the POLO RALPH LAUREN Marks during this time has enabled Polo Ralph Lauren Products to achieve world-wide fame under the POLO RALPH LAUREN Marks in its various markets. The public, customers, and the fashion industry have come to recognize that Polo Ralph Lauren bearing the POLO RALPH LAUREN Marks originate with Polo Ralph Lauren exclusively.

122. Polo Ralph Lauren has invested tens of millions of dollars in promoting the sale of Polo Ralph Lauren Products in a wide variety of media, and is the official sponsor of Wimbledon, the US Open and the 2008 and 2010 Olympics.

123. Polo Ralph Lauren maintains quality control standards for all of the Polo Ralph Lauren Products. All genuine Polo Ralph Lauren Products are inspected and approved by or on behalf of Polo Ralph Lauren prior to distribution and sale. All genuine Polo Ralph Lauren Products are distributed through Polo Ralph Lauren's worldwide network of authorized dealers.

124. Polo Ralph Lauren displays its POLO RALPH LAUREN Marks and Polo Ralph Lauren Products in its advertising and promotional materials. To date, Polo Ralph Lauren has spent hundreds of millions of dollars in advertising and promoting the POLO RALPH LAUREN Marks and Polo Ralph Lauren Products, and Polo Ralph Lauren, its predecessors-in-interest and its affiliated companies have enjoyed billions of dollars in sales.

125. The THE NORTH FACE Marks and POLO RALPH LAUREN Marks are collectively referred to as "Plaintiffs' Marks." The North Face Products and Polo Ralph Lauren Products are collectively referred to as "Plaintiffs' Products."

DEFENDANTS' CONDUCT

126. Plaintiffs The North Face and Polo Ralph Lauren are victims of a massive Internet counterfeiting ring of a size and scale they have not seen before. Defendants have manufactured, imported, distributed, offered for sale and sold counterfeit goods, including apparel, backpacks, shoes and gloves bearing counterfeits of THE NORTH FACE Marks or POLO RALPH LAUREN Marks (the "Counterfeit Products") and continue to do so.

127. Defendants, without any authorization or license from Plaintiffs, have knowingly and willfully used and continue to use Plaintiffs' Marks in connection with the advertisement, offer for sale and sale of the Counterfeit Products, through, *inter alia*, the Internet. The Counterfeit Products are not genuine Polo Ralph Lauren Products or The North Face Products. Plaintiffs did not manufacture, inspect or package the Counterfeit Products and did not approve the Counterfeit Products for sale or distribution.

128. Defendants operate a large number of websites they have designed to resemble authorized retail Internet stores selling Plaintiffs' authentic goods, including using domain names containing Plaintiffs' trademarks; copying Plaintiffs' copyrighted images and photographs of genuine products with detailed product descriptions; offering "24/7" live online service; and displaying normal indicia of security protection that would appear on legitimate websites ("Defendants' Websites"). A list showing examples, without limitation, of Defendants' Websites currently known to Plaintiffs is attached hereto as Exhibit A. Any of Defendants' Websites might appear to unknowing consumers to be legitimate web stores authorized to sell genuine Plaintiffs' Products.

129. Defendants' use of the Plaintiffs' Marks on or in connection with the advertising, marketing, distribution, offering for sale and sale of the Counterfeit Products is likely to cause and has caused confusion, mistake and deception by and among consumers and is irrevocably harming Plaintiffs.

130. Defendants have registered and are using a large number of domain names containing Plaintiffs' Marks, including, without limitation, 12polo.com, 4thenorthface.com, 91polo.com, addnorthface.com, authenticpolo.com, buytnf.com, cheerpolo.com, clothespolo.com, designerralph.com, googpolo.com, ilovethenorthface.com, laurenpolo.com, laurenpoloshirts.com, nicepolostore.com, nicepolostore.com, northface.cc, northfacecoming.com, northfacemountain.com, northfacecoming.com, northfaceoutdoor.com, northfaceoutletsale.com, north-face-sale.com, northfacesaleoutlet.com, northfacesalesoutlet.com, northfacesalestore.com, northfacesoutlet.com, northfacesupply.com, officepolo.com, officialnorthface.com, officialpolos.org, onlinenorthface.com, outdoornorthface.com, outletnorthface.com, polo4all.com, polo4sale.com, polocart.com, poloclothonline.com, poloearth.com, polohotsale.com, poloinfo.com, polomall.us, polonsale.com, polopolos.com, polo-ralph.com, poloralphsite.com, poloralphworld.com, poloshirtcompany.com, polo-shirts.us, poloshirts100.com, poloshirtsbuy.com, poloshirtssale.com, poloshirtsshop.com, poloshome.com, polostore.us, polostorebuy.com, polotops.com, polotou.com, polotrendy.com, polotshirtshan.com, ralphlauren100.com, ralphlaurendesigner.com, ralphlauren-polos.com, salenorthfaces.com, sellpoloshirts.com, thenorthfacecoming.com, thenorthfacemoving.com, thenorthfacesaleonline.com, thenorthfacesaleshop.com, thenorthfacesalesonline.com, thenorthfacesalestore.com, thenorthfacesaleshop.co.uk, thenorthfaceshow.com, thenorthfacesupplier.com, thenorthfacetrade.com, thenorthface-uk.com,

thenorthfaceukstore.com, tnfshopping.com, tonorthface.com, vivanpolo.com and likely many others not yet discovered by Plaintiffs (collectively, the "Infringing Domain Names").

131. The Infringing Domain Names registered by Defendants are identical and/or confusingly similar to one or more of the THE NORTH FACE Marks or POLO RALPH LAUREN Marks.

132. Defendants have registered and are using the Infringing Domain Names with the bad-faith intent to profit from these marks, namely fooling consumers into believing Defendants' Websites selling Counterfeit Products are actually selling authentic The North Face and Polo Ralph Lauren Products.

COUNT ONE

FEDERAL TRADEMARK COUNTERFEITING AND INFRINGEMENT
(15 U.S.C. § 1114)

133. Plaintiffs repeat and reallege the allegations above as if fully set forth herein.

134. The THE NORTH FACE Marks and the POLO RALPH LAUREN Marks and the goodwill of the businesses associated with them in the United States and throughout the world are of great and incalculable value, are highly distinctive, and have become universally associated in the public mind with The North Face Products and Polo Ralph Lauren Products and related services of the very highest quality and reputation finding their source from each The North Face Products and Polo Ralph Lauren, respectively.

135. Without Plaintiffs' authorization or consent, and having knowledge of both Plaintiffs' well-known and prior rights in Plaintiffs' Marks and the fact that Defendants' Counterfeit Products bear marks which are intentionally confusingly similar to the Plaintiffs' Marks, Defendants have manufactured, distributed, offered for sale and/or sold the Counterfeit Products to the consuming public in direct competition with The North Face and Polo Ralph

Lauren's sale of genuine The North Face Products and Polo Ralph Lauren Products, in or affecting interstate commerce.

136. Defendants' use of copies or simulations of the THE NORTH FACE Marks and the POLO RALPH LAUREN Marks in conjunction with Defendants' Websites and the Counterfeit Products is likely to cause and is causing confusion, mistake and deception among the general purchasing public as to the origin of the Counterfeit Products, and is likely to deceive the public into believing the Counterfeit Products being sold by Defendants originate from, are associated with or are otherwise authorized by The North Face and Polo Ralph Lauren, all to the damage and detriment of each Plaintiff's reputation, goodwill and sales.

137. Plaintiffs have no adequate remedy at law and, if Defendants' activities are not enjoined, each Plaintiff will continue to suffer irreparable harm and injury to its goodwill and reputation.

COUNT TWO

UNFAIR COMPETITION AND FALSE DESIGNATION OF ORIGIN
(15 U.S.C. § 1125(a))

138. Plaintiffs repeat and reallege the allegations above as if fully set forth herein.

139. The Counterfeit Products sold and offered for sale by Defendants are of the same nature and type as each Plaintiff's Products sold and offered for sale by each Plaintiff and, as such, Defendants' use is likely to cause confusion to the general purchasing public.

140. By misappropriating and using the Plaintiffs' Marks and trade names, Defendants misrepresent and falsely describe to the general public the origin and source of the Counterfeit Products and create a likelihood of confusion by consumers as to the source of such merchandise.

141. Defendants' unlawful, unauthorized and unlicensed manufacture, distribution, offer for sale and/or sale of the Counterfeit Products creates express and implied misrepresentations that the Counterfeit Products were created, authorized or approved by Plaintiffs, all to Defendants' profit and to Plaintiffs' great damage and injury.

142. Defendants' aforesaid acts are in violation of Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a), in that Defendants' use of the Plaintiff's Marks, in connection with their goods and services, in interstate commerce constitutes a false designation of origin and unfair competition.

143. Plaintiffs have no adequate remedy at law and, if the Defendants' activities are not enjoined, each Plaintiff will continue to suffer irreparable harm and injury to its goodwill and reputation.

COUNT THREE

CYBERSQUATTING UNDER THE ANTICYBERSQUATTING CONSUMER PROTECTION ACT
(15 U.S.C. § 1125(d)(1))

144. Plaintiffs repeat and reallege the allegations above as if fully set forth herein.

145. The Infringing Domain Names are identical or confusingly similar to one or more of the THE NORTH FACE Marks or the POLO RALPH LAUREN Marks, which were distinctive and/or famous at the time Defendants registered each of the Infringing Domain Names.

146. Defendants registered and have used the Infringing Domain Names with a bad-faith intent to profit from the Plaintiffs' Marks.

147. Defendants' activities as alleged herein violate the federal Anticybersquatting Consumer Protection Act, 15 U.S.C. § 1125(d)(1).

148. Plaintiffs have no adequate remedy at law and, if the Defendants' activities are not enjoined, Plaintiffs will continue to suffer irreparable harm and injury to its goodwill and reputation.

COUNT FOUR

UNLAWFUL DECEPTIVE ACTS AND PRACTICES
(New York General Business Law § 349)

149. Plaintiffs repeat and reallege the allegations above as if fully set forth herein.

150. Defendants, without Plaintiffs' authorization or consent, and having knowledge of each Plaintiff's well-known and prior rights in each Plaintiff's Marks, and the fact that Defendants' Counterfeit Products bear marks which are identical to Plaintiffs' Marks, Defendants have manufactured, imported, distributed, offered for sale and/or sold the Counterfeit Products to the consuming public in direct competition with Plaintiffs' sale of genuine merchandise and in violation of New York General Business Law § 349.

151. Defendants' use of copies or simulations of Plaintiffs' Marks is likely to cause and is causing confusion, mistake and deception among the general purchasing public as to the origin of Defendants' Counterfeit Products, and is likely to deceive the public into believing the Counterfeit Products being sold by Defendants originate from, are associated with, or are otherwise authorized by Plaintiffs.

152. Defendants' deceptive acts and practices involve public sales activities of a recurring nature.

153. Plaintiffs have no adequate remedy at law and, if Defendants' activities are not enjoined, Plaintiffs will continue to suffer irreparable harm and injury to their goodwill and reputations.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray for judgment against Defendants as follows:

1. That Defendants, their officers, agents, servants, employees, attorneys, confederates, and all persons acting for, with, by, through or under them be permanently enjoined and restrained:
 - a. from using Plaintiffs' Marks in any manner in connection with the advertising, offering for sale, or sale of any product not Plaintiffs', or not authorized by Plaintiffs to be sold in connection with each of Plaintiffs' Marks;
 - b. from passing off, inducing, or enabling others to sell or pass off any product as and for products produced by Plaintiffs, which are not Plaintiffs' or not produced under the control and supervision of Plaintiffs and approved by Plaintiffs for sale under Plaintiffs' Marks;
 - c. from committing any acts calculated to cause purchasers to believe that Defendants' products are those sold under the control and supervision of Plaintiffs, or sponsored or approved by, or connected with, or guaranteed by, or produced under the control and supervision of Plaintiffs;
 - d. from further infringing all of Plaintiffs' Marks and damaging Plaintiffs' goodwill;
 - e. from otherwise competing unfairly with Plaintiffs in any manner;
 - f. from shipping, delivering, distributing, returning or otherwise disposing of, in any manner, products or inventory not manufactured by or for Plaintiffs, nor

authorized by Plaintiffs to be sold or offered for sale, and which bear any

Plaintiffs' Marks; or

g. using, linking to, transferring, selling, exercising control over, or otherwise owning the Infringing Domain Names or any other domain name that incorporates, in whole or in part, any of Plaintiffs' Marks.

2. That Defendants, within thirty (30) days after service of judgment with notice of entry thereof upon it, be required to file with the Court and serve upon Plaintiffs a written report under oath setting forth in detail the manner in which Defendants have complied with paragraphs 5, a through g, *supra*.

3. That the Defendants' Websites and Infringing Domain Names be deleted from the root zone servers operated and maintained by the domain name registries, including VeriSign, Inc and Neustar, Inc.

4. That domain name registries, including VeriSign, Inc. and NeuStar, Inc., be required to cooperate with a registrar to be appointed by Plaintiffs to re-register the Defendants' Websites and Infringing Domain Names in Plaintiffs' respective names and under Plaintiffs' respective ownership.

5. That Defendants account for and pay over to Plaintiffs profits realized by Defendants by reason of Defendants' unlawful acts herein alleged and, that the amount of damages for infringement of Plaintiffs' registered trademarks be increased by a sum not exceeding three times the amount thereof as provided by law.

6. In the alternative, that Plaintiffs be awarded statutory damages of \$2,000,000 for each and every Plaintiffs' Mark counterfeited by each Defendant and \$250,000 per Infringing Domain Name for Defendants' willful counterfeiting and cybersquatting of the Plaintiffs' Marks.

7. That Plaintiffs be awarded reasonable attorneys fees and have such other and further relief as the Court may deem equitable including, but not limited to, any relief set forth under Sections 34-39 of the 1946 Trademark Act and/or C.G.S.A. §§ 35-11(i), 42-110(a) *et seq.*, 42-110(b) *et seq.*

Dated: New York, NY
May 12, 2010

Respectfully submitted,

By:

G. Roxanne Elings (elingsr@gtlaw.com)
Scott Gelin (gelins@gtlaw.com)
Seth E. Kertzer (kertzers@gtlaw.com)
MetLife Building
200 Park Avenue
New York, NY 10166
Telephone: (212) 801-9200
Facsimile: (212) 801-6400

*Attorneys for The North Face Apparel Corp.
and PRL USA Holdings, Inc.*

EXHIBIT A

Domain	Central Ranking Factor	Registrant	Registrant Address	Country	City	Email	ISP
08hot.com	Model Search	grs.hichina.com whois.godaddy.com	li xuehao shenjibao	beijing China	beijing	langyanet@yahoo.com.cn	VPS INC. O/B/A KRYPT TECHNOLOGIES SINGLEHOP INC
12hot.com	Model Search	whois.dns.com.cn	Anna	925 Wheellwood Way 10044 Rosbrook Dr. 448313 WG Andy Huang site:kevin.eksl.info site 361000 Phone: +1.323 34 Fax: +2345643 Email	United States		ALTUHOST INC
40trade.com	Product Search	whois.name.com	Andy Huang	12330 Crested Moss NE 611	United States		BLUEHOST INC
50trade.com	Model Search	whois.dns.com.cn	rachel	125 Rampart Way Suite 300 Denver CO 80230 Phone: +1.7202492374 Email	United States		ALTUHOST INC
91handbags.com	Model Search	whois.name.com	Services - Customer ID: NCR-520561	longxinfu@163.com 91handbags.com@protecteddomain ainservices.com	United States	91handbags.com@protecteddomain ainservices.com	THEPLANET.COM INTERNET SERVICES INC
91000.com	Shipping Text Match	whois.toradnic.com whois.paycenter.com.cn whois.paycenter.com.cn	wangming Hao chen guo kun	Province/state: GD Country: Postal Code: 5118001 Hao chen Bao Kun	China	Tianjin shen zhen	GODADDY.COM INC WEBNX SOFTLAYER TECHNOLOGIES INC
addnorthface.com	General Text Match	whois.hichina.com	Michael Sean Barrett	Michael Lin Tianhang Road Hangzhou Zhejian 310000 Phone: +86.13666935173 Email treitman Road	China	chengdu uu54478@gmail.com barrettsan@gmail.com	ALTUHOST INC AKANOC SOLUTIONS INC
apparelangels.com	Shared Server	whois.dns.com.cn	Alessandra	2405 thomas rd st ne 831573 WG	United States		ALTUHOST INC
autobotsale.com	Model Search	whois.dns.com.cn	Paul	1223 hamlin street Po Box 8688 471636 WG	United States		ALTUHOST INC
authenticpolo.com	Model Search	whois.dns.com.cn	emma	2459 sw daisy rd 2117 S Andover Rd 345887 WG	United States		ALTUHOST INC
b2bfashion.com	Model Search	whois.dns.com.cn	chen yuan	Nann town putian 351100 F1 103 the broadway highland farm rd apt 601505 WG	China		ALTUHOST INC
b2bshine.com	Shipping Text Match	whois.dns.com.cn	kyle	MeiYuan road Putian City Fujian putian, New York 35000 1719 Brandywine Ct Atlanta, Georgia	United States		ALTUHOST INC
b2dforyou.com	Product Search	whois.godaddy.com	customer admin	andy lu	United States	mmmsms@126.com	THEPLANET.COM INTERNET SERVICES INC.
bachmail.com	Page Match	Wild West Domains	hsgs	1360 N Hancock St. Anaheim, CA 92807 Guangdong 301100 shijiazhuang asdfasd Foreignness 234234 WG	Faroe Islands		PANAMASERVER.COM
bootsdept.com	Model Search	whois.dns.com.cn	whois.godaddy.com	liu dong ping	China	stijiazhuang greendean@googlemart.com	ALTUHOST INC
bybclothes.com	Shipping Text Match	@s.hichina.com	adafast	9317th avenue 125 springs rd. 792159 WG	United States		GODADDY.COM INC
byshirt.com	Model Search	whois.dns.com.cn	bernard	1360 N Hancock St. Anaheim, CA 92807 xiadAnnie forgevette Road bbfbbfb 126250 WG	United States		ALTUHOST INC
cheapgoodsale.com	Model Search	whois.dns.com.cn	Liu Dongping	Liu Dongping kuzhen fu	Ecuador		ALTUHOST INC
cheerpolo.com	Model Search	whois.dns.com.cn		6227 cielo grande dr 11 South 10th Street 794950 WG 3301 Olis St. 1902 n salina 215002 WG	United States		ALTUHOST INC
clothespolo.com	Model Search	whois.tucows.com whois.paycenter.com.cn	Annie xiao	feifei wang 15926606054 Fax: 0159-26606054 wuhan wuhan hubel 3610044n	United States		AKANOC SOLUTIONS INC
crazypurchase.com	Page Match	whois.dns.com.cn		Kensley 2400 Queens Chapel Rd Hawthorne 20721US	China	8651699338@qq.com	SOFTLAYER TECHNOLOGIES INC
crazyshipping.com	Shipping Text Match	whois.dns.com.cn		lifeng lifeng	United States		THEPLANET.COM INTERNET SERVICES INC
designernraiph.com	Image Match	whois.dns.com.cn	Hayley	feifei wang 15926606054 Fax: 0159-26606054 wuhan wuhan hubel 3610044n	China		GLOBAL NET ACCESS LLC
easybuying.com	Shipping Text Match	whois.dns.com.cn	florent	215002 WG	United States		SOFTLAYER TECHNOLOGIES INC
ebayholder.com	Links to Network Site	whois.paycenter.com.cn	xu zhen fu	kuzhen fu	China	2h688@yahoo.com.cn	SOFTLAYER TECHNOLOGIES INC
ecseals.com	Shared Server	whosibiz.com	wangxiaoj	feifei wang 15926606054 Fax: 0159-26606054 wuhan wuhan hubel 3610044n	China		THEPLANET.COM INTERNET SERVICES INC
edwardsstores.net	Model Search	whosibiz.com	ECS Deals lubar	Kensley 2400 Queens Chapel Rd Hawthorne 20721US	United States		GLOBAL NET ACCESS LLC
exportnik.com	Shared Server	whosibiz.com	Jing Feng	2h123456 Fax: 123456 qq qq jf	China	2h688@yahoo.com.cn	SOFTLAYER TECHNOLOGIES INC
			2h688	320000cn			

Domain	General Fuzzy Factor	Registrant	Address	City	Email	Country
factory4replica.com	Product Search	Andy Huang	Andy Huang 361000 Phone: +1.323.34 Fax: +2345643 Email	United States		BLUEHOST INC
fashionholder.com	Product Search	whois.name.com	Andy Huang	Andy Huang 361000 Phone: +1.323.34 Fax: +2345643 Email	United States	OC3 NETWORKS & WEB SOLUTIONS
goodgoodshop.com	Shipping Text Match	whois.dns.com.cn	Jose	216 Logan St Apt 3 60 State Hwy 9A, 42797 WG	United States	ALTUHOST INC
groupshoes.com	Model Search	whois.name.com	Michael	Michael Lin Tian Tang Road Hangzhou Zhejiang 310000 Phone: +86.13666935173 Email	China	ALTUHOST INC
hushbuy.com	Product Search	whois.name.com	Liu Dongping	Michael Lin Tian Tang Road Hangzhou Zhejiang 310000 Phone: +86.13666935173 Email	Bolivia	ALTUHOST INC
likeshop.com	Model Search	whos.dns.com.cn	Li wen	Iaiyouxiamen fujianputian City: putian Province/State: FJ Country: Postal Code: 351100 125 Rampart Way Suite 300 Denver CO 80230 Phone: +1.3034596012 Email	China	XIANGDAKIN NETWORKS TECHNOLOGY CO. LTD
ilovethenorthface.com	New Domain - Not Built - Same Behavior	whois.paycenter.com.cn	Yuan Chen	Protected Domain Services - Customer ID: DSR-669253	United States	AKANOC SOLUTIONS INC
intheego.com	Model Search	whos.todainic.com	Jonnylo	Yi Qiaoying Wu block 523 Ganyue road,Gulou Fuzhou, 350002, China	China	GLOBAL NET ACCESS LLC
ioffer.com	Shared Server	whois.name.com	Jing Yang	reimengu Registrant Postal 012000 Registrant Registrant Country CN Domains by Proxy, Inc	China	SOFTLAYER TECHNOLOGIES INC
jacketmail.us	Model Search	whois.nic.us	Andy Huang	361000 Phone: +1.323.34 Fax: +2345643 Email	United States	THERPLANET.COM INTERNET SERVICES INC
jacketscart.com	Model Search	whos.godaddy.com	jonnylo	clion 55555 san jose, Colorado 33000	United States	HOSTFORWEB INC
keepwinterwarm.com	Product Search	whos.godaddy.com	Andy Huang	Qiaoying Wu block 523 Ganyue road,Gulou Fuzhou, 350002, China	China	BLUEHOST INC
kingpool.com	Model Search	whos.fastdomain.com	lowestbest exp.co.ltd	Tiantang Road	China	GLOBAL NET ACCESS LLC
lowestbest-export.com	Shared Server	whos.fastdomain.com	Michael Lin	Michael Lin Tian Tang Road Hangzhou Zhejiang 310000 Phone: +86.13666935173 Email	China	ALTUHOST INC
mallabroad.com	Model Search	whos.godaddy.com	Michael	536MillardFarmerRd	China	ALTUHOST INC
mallabroad.com	Model Search	whois.name.com	Lynda	536MillardFarmerRd 433518 WG	United States	ALTUHOST INC
marheaven.com	Shipping Text Match	whois.dns.com.cn	wang linling	Wanglinming	China	LUNAR PAGES
mensclothingus.com	Model Search	whos.paycenter.com.cn	anthony	601054 WG	United States	AKANOC SOLUTIONS INC
mixitems.com	Shipping Text Match	whois.dns.com.cn	huang zhipei	Xueyuan Road 1005,Wuyuan road, Registerant Putian Registrant Fujian Registrant Postal 361004 Registrant Registrant Country CN	China	WEBNX
moncler-jackets.org	Contact Detail Match	Public Interest Registry	Minglei Lu	F36 weiping road, Registerant Putian Registrant Fujian Registrant Postal 361007 Registrant Registrant Country CN	China	WEBNX
monclerjackets.us	Contact Detail Match	whois.nic.us	Winteng Lu	Putian	monclerjacketsus@yahoo.com	WEBNX
moncleronsaleus.com	Contact Detail Match	whois.name.us	tangyiwei			
mybrandclothing.com	Links to Network Site	whos.paycenter.com.cn	wang liming		54981835@qq.com	WEBNX
mybrandclothing.com	Model Search	whos.dns.com.cn			tang007@foxmail.com	AKANOC SOLUTIONS INC

Domain	General Text Match	Protected Domain	Country	City	Email	Registrant
myleans.com	Shared Server	whois.papercenter.com.cn	Zhiguo zhao	China	Beijing	GLOBAL NET ACCESS LLC
myshopbay.com	Shipping Text Match	whois.godaddy.com	Linus Tomatis	maitsis Road hefei, anhui 7138290	China	ALTUHOST INC
nhinfrontline.com	Shared Server	whois.dns.com.cn	Jonathan	RIDGE RD 541391 WG 27 Pleasant Ave. 3910 Kirview	United States	ALTUHOST INC
nitspalystore.com	Model Search	whois.dns.com.cn	Stewart	St NW 378154 WG 4391 birchfield loop 125 springs	United States	ALTUHOST INC
niceschoolers.com	Model Search	whois.dns.com.cn	Cristina	rd. 5693716 WG jiang song US71-86052284 fax: 020-82582409	United States	ALTUHOST INC
niketclubs.com	Product Search	whois.bitcn.com	songjiang	zhejianghangzhou hangzhou zhejiang 3100012n	China	lanlingwork@qq.com
northface.cc	Model Search	whois.webnic.cc	Dongming Li	No.153 Lihua Road, Siming Qu, Xiamen	Fujian	zi zi_12@126.com
northfacecoming.com	Model Search	whois.dns.com.cn	sharon	Xi'anmen aparasyee Road Foreignness	United States	PANAMASERVER.COM
northfacemountain.com	Model Search	whois.dns.com.cn	Kayce	po box 158 Thankful church rd 584688 WG	Panama	COSWELL ENTERPRISES INC
northfaceoutdoor.com	Model Search	whois.dns.com.cn	marcus	sdgsdfg sdgsdfg Yuerhua Trading company	United States	ALTUHOST INC
northfaceoutletsale.com	Model Search	whois.dns.com.cn		sdgsdfg Foreignness 23452 WG chengxiang district, xialin road putian, Fujian 351100	United States	ALTUHOST INC
north-face-sale.com	Model Search	whois.godaddy.com		ningxiayinchuang Yingchuan 786754 NX	China	GODADDY.COM INC
northfacesaleoutlet.com	Model Search	whois.dns.com.cn	tina	Nanhaihou road 1187/78 Fanzhi 601 Shanghai	China	ALTUHOST INC
northfacesalesoutlet.com	Registrant Match	whois.above.com	Ho Nilm	607 15th Pudong	homishop@gmail.com	STAMINUS COMMUNICATIONS
northfacesalestore.com	Model Search	whois.dns.com.cn	Kifhdh	10thgd Foreignness 762423 WG Jillier Cunningham	Equatorial Guinea	AKANOC SOLUTIONS INC
northfacesoutlet.com	Model Search	whois.papercenter.com.cn	Jillier Cunningham	23834 Traceea ave 20089 Ian	China	ALTUHOST INC
northfacesupply.com	Model Search	whois.dns.com.cn	Elizabeth	Kenney Drive 351400 WG 207 Northwind Dr. Angel Island	United States	ALTUHOST INC
officepeipei.com	Model Search	whois.dns.com.cn	Any	540392 WG mimosa lane Kirk hollow road 2023350 WG	United States	ALTUHOST INC
officialnorthface.com	Model Search	whois.dns.com.cn	andrew	1407 15th 602MAPLE ST. Rice St. Lindenwood Drive	United States	ALTUHOST INC
officialpolios.org	General Text Match	Public Interest Registry	PERKLIS	629621 WG Kenney Drive Kenney Drive	United States	ALTUHOST INC
onlineonnorthface.com	Model Search	whois.dns.com.cn	michelle	545358 WG Blackwood Dr double church	United States	ALTUHOST INC
onlinepaintstore.com	Model Search	whois.dns.com.cn	Trelene	road 163743 WG McGuffey RD phinelevel court	United States	BASESQUARED
outdoornorthface.com	Model Search	whois.dns.com.cn	Leanne	374973 WG 34170 W. 241st St. 4507	United States	ALTUHOST INC
polo4all.com	Shipping Text Match	whois.dns.com.cn	rebecca	Sabrina Terr. 819669 WG 1315 rab ave 108 Lee St	United States	ALTUHOST INC
polo4sale.com	Image Match	whois.dns.com.cn	Shafiq	831529 WG	United States	ALTUHOST INC
policart.com	Model Search	whois.godaddy.com	Domains by Proxy, Inc.			SINGLEHOP INC
polensale.com	General Text Match	whois.dns.com.cn	Massimo	1415 n. st augustine rd 3512 Wurstier Court 379262 WG	United States	ALTUHOST INC
polar-ralph.com	Shared Server	whois.name.com	Protected Domain Services Customer ID: DSR037121	125 Rampart Way Suite 300 Denver CO 80130 Phone: +1.3034556012 Email:	United States	GLOBAL NET ACCESS LLC
polarshirworld.com	Model Search	whois.dns.com.cn	clare	102 South Ave 8601-a paseo alameda 54055 WG	United States	polaralph.com@protecteddomain nservices.com
polarshirtscompany.com	Image Match	whois.dns.com.cn	Paul	10833 State Line Road Apt#5 471 Oak Place 604859 WG T-3-T203 Jintengyuan Fengtai WA Registrant Postal 100039 Registrant Registrant Country	United States	ALTUHOST INC
polo-shirts.us	Model Search	whois.nic.us	jummin jia	CN CN	jummin_jia@hotmail.com	LUNAR PAGES

Domain	Contact Email	Registrant Email	Registrant	Address	City	State/Prov	Email
poloshirtssale.com	Model Search	whoisfastdomain.com	Attn: poloshirtssale.com	Bluehost.com- INC 1958 South 950 East ** FREE DOMAIN REGISTRATION ** Hosting plans starting at ONLY \$5.95 per month - Provo, Utah 84606	United States		whois@bluehost.com
poloshirtshop.com	Model Search	whois.enom.com	DNS	Admin 3655 Torrance Blvd Torrance CA 90503US	United States		bluehostINC
poloshome.com	Shipping Text Match	whoisdns.com.cn	Jose	125 springs rd P.O. Box 980 Songhuajiang road 25228, room 9-203 Registrant Shanghai Registrant Postal 200637	United States		GIGENET
polostore.us	Shipping Text Match	whois.nic.us	Fei Xu	Registrant Registrant Country CN 4284 Worth St 2524 High Ridge Dr. 4144689 WG danmarlie - 391100 China	China		ALTUHOST INC
poloshirtshahn.com	Model Search	whois.dns.com.cn	sarah	xing datoulong Box Ct 3262 silverwood drive	United States		ALTUHOST INC
product wholesale.com	Model Search	whois.godaddy.com	Audrey	965436 WG	United States		LA HABRA - LUNAR PAGES
ralphlaurendesigner.com	Image Match	whois dns com.cn	Alison	18715 Echo Pines 1208 george ct apt 2 89413 WG	United States		ALTUHOST INC
retallas.com	Model Search	whois.dns.com.cn	christina	1628 Maple St 1245 Biscayne Rd. 542953 WG	United States		ALTUHOST INC
salenorthfaces.com	Model Search	whois.dns.com.cn	Hao chen	219 w 5th ave 3436 fletcher dr.	United States		ALTUHOST INC
searchbikini.com	Model Search	whois.dns.com.cn	Donna Allsop	41 391354 WG	United States		ALTUHOST INC
selfpolohirts.com	Model Search	whois.psycenter.com.cn	wang liming	wangliming 819 butterfly n 4792 pl s.e.	China		LUNAR PAGES
sharinggate.com	Model Search	whois.dns.com.cn	Sarah	772845 WG	United States		ALTUHOST INC
shoessaler.com	Shared Server	whois.cn.hooyoo.com			N/A		GLOBAL NET ACCESS LLC
shoppinginthebox.com	General Text Match	whois.psycenter.com.cn	Hao chen	Sable Pointe Drive Eagle Bluff	China		WEBNX
takefashionaway.com	Model Search	whois.dns.com.cn	Gabor	Drive 974800 WG	United States		ALTUHOST INC
tbi.pop.com	Shipping Text Match	whois.dns.com.cn	chris	220 / windsell drive 616 Pelham rd s 746333 WG	United States		ALTUHOST INC
tgcool.com	Model Search	whois.name.com	Michael	Michael Lin Tian Tang Road Hangzhou Zhejian 310000 Phone +86.1366635173 Email	China	ui54478@gmail.com	ALTUHOST INC
theb2bonline.com	Model Search	whois.dns.com.cn	Vikki	2355 west 10755 south 2137 Maynard Dr. 544402 WG	United States		ALTUHOST INC
thenorthfacecoming.com	Model Search	whois.above.com	Ho Nimi	118728-501 Nam Natou road Shanghai 200125 Tel. 86.3671865757 Fax.	China	Fangzhi honimitha@gmail.com	STAMINUS COMMUNICATIONS
thenorthfacemoving.com	Contact Detail Match	whois.cn.hooyoo.com	caixiansheng	0592-2296505 putian putian fujian 361100cn dfgdfhdh Foreigners 243553	China	14807336@qq.com	N/A
thenorthfacesonline.com	Model Search	whois.dns.com.cn	wirrewet	WG xiansheng cat 13859851061 fax:	United States		ALTUHOST INC
thenorthfaceshop.co.uk	Model Search	whois.nic.uk	zhonglixiashou	guangdong sheng xingning shifushou kouzhen shenzhen guangdong 518 000	China		THEPLANET.COM INTERNET SERVICES INC
thenorthfaceshop.com	Page Match	whois.dns.com.cn	fdgdfdfdg	sfdsafsd Foreignness 354645	WG		ALTUHOST INC
thenorthfacesonline.com	Model Search	whois.dns.com.cn	Max	444 n. 18 th ave. 2412 53rd Street #37534 WG	United States		ALTUHOST INC
thenorthfacesalestore.com	Model Search	whois.dns.com.cn	dgfdfdfh	dfgdfhdh Foreignness 343355	WG		ALTUHOST INC
thenorthfacestoshow.com	Model Search	whois.dns.com.cn	kenneth	3113 fredricksburg drive 4717 Shadeway Rd 314819 WG	United States		ALTUHOST INC
thenorthfacesupplier.com	Model Search	whois.cn.hooyoo.com	ctcixiansheng	0592-2296505 putian putian fujian 361100cn	China	14807336@qq.com	ALTUHOST INC
thenorthfacetrade.com	Model Search	whois.cn.hooyoo.com	caixiansheng	0592-2296505 putian putian fujian 361100cn	China	14807336@qq.com	ALTUHOST INC

Contact	Central Information	Registrant	Registrant Address	Registrant City	Registrant Country	Email	ISP
thenorthfaceukstore.com	Model Search	whois.dns.com.cn	kate		United States		ALTUHOST INC
timberlandsky.com	Model Search	whois.name.com	Michael	Michael Lin Tianfang Road Hangzhou Zhejian 310000 Phone: +86-13666935173 Email: China	China	uu54478@mail.com	ALTUHOST INC
tnfshopping.com	Model Search	whois.dns.com.cn	Sergej	Gregory Avenue Harry d. st #10 450958 WG	United States		ALTUHOST INC
tonorthface.com	Model Search	whois.dns.com.cn	Abdur	huaerstreet florida 932857 WG	United States		ALTUHOST INC
trade glory.com	Shared Server	whois.bnzen.com	Huang ming	Lao John 059533722766#8X 0595332266#88 huailin Road fuzhou fujian China putian city fujian 3500001cn	China	admin@tradeglory.com	SOFTLAYER TECHNOLOGIES INC
uggcardy.org	Model Search	Public Interest Registry	BlueHost.Com - INC	*FREE* 112 Conifer rd 5813 Arnold St. #647 154774 WG	United States	whois@bluehost.com	BLUEHOST INC
usuksale.com	Model Search	whois.dns.com.cn	Wiedur	Michael Lin Tianfang Road Hangzhou Zhejian 310000 Phone: +86-13666935173 Email: China	China	uu54478@mail.com	ALTUHOST INC
vinshine.com	Model Search	whois.name.com	Michael	Guangzhou open sesame technology co.ltd	Guangzhou	uu54478@mail.com	ALTUHOST INC
vogueport.com	Shared Server	whois.paycenter.com.cn	may	Zhongran road 12 beijing.	China		SOFTLAYER TECHNOLOGIES INC
wearmyroleknow.com	Model Search	whois.godaddy.com	Jin yiping	beijing 100038	China		GODADDY.COM INC
wholesale-retailer.com	Model Search	whois.dns.com.cn	Debra	4. robin lane berkley 501570 WG	United States		ALTUHOST INC
wholesale-retailer.com	Model Search	whois.dns.com.cn	Debra	4. robin lane berkley 501570 WG	United States		ALTUHOST INC
worldwholesaler.net	Model Search	whois.dns.com.cn	David	Hooper drive buchanan bldg apt 459938 WG	United States		ALTUHOST INC
wwwboats.com	Model Search	whois.dns.com.cn	antti-jussi	318 Darby Terrace 2405 thomas rd 782699 WG	United States		BASESQUARED